
Exclusion Policy

About us

Alpha Real Capital Ltd ('the Group') encompasses Alpha Real Capital LLP ('AlphaReal') and TIME Investments ('TIME'). AlphaReal is a specialist real assets investment manager focused on secure income strategies, typically investing in UK and European assets with predictable secure long-term cash flows. TIME is the Group's authorised wealth management investment solutions arm*.

We are signatories to the United Nations Principles for Responsible Investment (UN PRI), the UN Global Compact and members of the European Association for Investors in Non-Listed Real Estate (INREV) and European Association for Investors in Non-Listed Real Estate (AREF).

The Group works with a wide range of UK, European and international investors, including pension funds, insurers and other large institutional investors as well as private investors, financial advisers, and wealth managers through TIME. We look for long-term relationships with our investment partners, tenants, lenders and other stakeholders.

ESG philosophy and exclusions

We believe that portfolio exclusions, together with engagement on ESG issues can support us in delivering our sustainability commitments and truly integrating ESG considerations into our investment decision-making process.

Generally, we believe engaging at the investment level is a more effective way to drive positive change. Nonetheless, we also recognise that some sectors and economic activities pose significant risks to the planet and to people, and which are fundamentally misaligned with our ESG philosophy and corporate values. As a result, we have implemented this policy as a baseline to actively exclude exposure to sectors and activities from our investment universe.

The excluded sectors and thresholds are reviewed at least annually by the Chief Investment Officer and Head of Sustainability together with the Chief Operating Officer.

Policy scope

We aim to apply these exclusions to all actively managed products where we have discretion over the investment solution.

The baseline exclusions defined in this policy consist of sectors and economic activities wherein the Group will not invest, if the counterparty derives income from the excluded activities or sectors above the relevant threshold.

Monitoring and divestment

The Group confirms that no current investments meet the materiality thresholds.

If the introduction of a new sector and/or activity to the exclusion list below (or changes to the revenue thresholds) leads to current holdings conflicting with this policy, the Manager will seek to engage with the entity and, where needed, divestment shall be completed as soon as reasonably practicable.

* Further information is available on our websites: [About Us - AlphaReal](#) and [TIME Investments \(time-investments.com\)](#)

Exclusions

Product-based exclusions

Exclusion	Definition
Thermal coal	Any company/tenant/group with revenues > 25% from mining or sale to third parties, and any company/tenant/group with > 50% from coal power generation.
Oil/tar sands	Any company/tenant/group with revenues > 25% from oil sands extraction.
Controversial weapons	Any company/tenant/group with ties to the manufacture or sale of indiscriminate weapons such as cluster munitions, landmines, biological/chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, napalm, white phosphorous and/or non-detectable fragment weapons or munitions.

Behaviour-based exclusions

Exclusion	Definition
UNGC violations	As a participant of the United National Global Compact (UNGC), the Manager acts in accordance with the international standards on responsible investment conduct set by the UNGC principles. If the Manager deems an entity to severely breach these standards and considers engagement possible, the Manager will engage with the relevant entity through a structured & time-bound engagement program. Provided the engagement is successful, the company becomes eligible for investments, otherwise, the Company becomes excluded, and the manager will seek to divest from the entity.
Legal or regulatory violations	The lease requires the tenant to comply with all relevant regulatory and statutory requirements.